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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In re Petition of )  
 )  
MERIDIAN COMMUNICATIONS )  
COMPANY )  
 )  
For Amendment of § 73.606(b), )  
TV Table of Allotments, )  
to Delete Channel 34 from )  
Lake Havasu City, Arizona and to )  
Add Channel 34 at Laughlin, Nevada )

RM-8902

MM Docket No. \_\_\_\_\_

To: The Chief, Allocations Branch

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SUPPLEMENT TO PETITION FOR RULEMAKING

Meridian Communications Company ("Meridian"), permittee of a unbuilt television station authorized to operate on Channel 34 at Lake Havasu City, Arizona, hereby supplements its Petition for Rulemaking, filed July 9, 1996, to change the community of license of Channel 34 from Lake Havasu City to Laughlin, Nevada.

In its July 9, 1996, Petition, Meridian demonstrated that the proposed reallocation of Channel 34 to Laughlin, Nevada would provide that community with its first local television transmission facility and permit the new television station to serve a far larger area and population than would be possible with the currently authorized facility licensed to Lake Havasu City. Meridian further demonstrated that the optimum site for maximized coverage of the area is a Bureau of Land Management site at Oatman, Arizona, from which it was uncertain whether city grade coverage to all of Lake

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Havasu City could be achieved. A new facility at the Oatman site would provide excellent coverage, however, to the entirety of Laughlin, a high growth area with a concomitant need for a local television transmission service.

As set forth in the attached Supplemental Engineering Exhibit, prepared by Michael W. Radovich, P.E., while it appears that city grade coverage of Lake Havasu City could in fact be achieved from the preferred Oatman site, line-of-sight service would not be available to the entire community. Moreover, intervening terrain configurations are such that "no location within the community of Lake Havasu [would] have an unobstructed path from Meridian's preferred transmitter site." Thus, operation at the Oatman site would not meet the specifications of Section 73.685(b) with respect to Lake Havasu City. Supplemental Engineering Exhibit at 2.

Meridian believes that the deficiencies in line-of-sight coverage render the Oatman site inappropriate for a station licensed to Lake Havasu City. The Oatman site is ideal, however, for coverage of Laughlin, Nevada, and for maximized service to the surrounding area. Further, as shown in the Petition, Laughlin is, and will be in the future, far more capable of supporting a local television station than Lake Havasu City<sup>1</sup>.

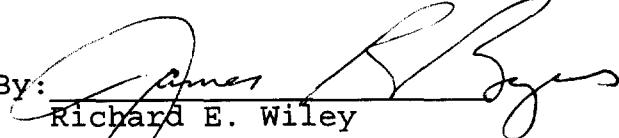
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<sup>1</sup> Should the Commission determine that Lake Havasu City warrants a replacement allotment, Channel 40 (or any of eleven other channels identified in the Petition and accompanying Engineering Statement) can be used in that community.

Accordingly, for the reasons set forth above and in its July 9, 1996, Petition for Rulemaking, Meridian requests that the Commission reallocate Channel 34 to Laughlin, Nevada and modify Meridian's outstanding construction permit accordingly.

Respectfully submitted,

MERIDIAN COMMUNICATIONS COMPANY

By: 

Richard E. Wiley

James R. Bayes

of

Wiley, Rein & Fielding

1776 K Street, N.W.

Washington, D.C. 20006

(202) 429-7000

Its Attorneys

November 20, 1996



# **OWL ENGINEERING, INC.**

**CONSULTING COMMUNICATIONS ENGINEERS  
EMC TEST LABORATORIES**

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(612) 785-4115 • Fax (612) 785-4631  
1-800-797-1338**

**SUPPLEMENTAL ENGINEERING EXHIBIT  
ON BEHALF OF  
MERIDIAN COMMUNICATIONS COMPANY  
IN SUPPORT OF A PETITION TO AMEND  
THE TV TABLE OF ALLOTMENTS  
LAUGHLIN, NEVADA**

**October 28, 1996**

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Owl Engineering, Inc. has been retained by Meridian Communications Company (hereinafter Meridian) to prepare this Supplemental Engineering Exhibit. The purpose of this exhibit is to determine the quality of the propagation path from Meridian's preferred transmitter site for channel 34 at Laughlin, Nevada to the community of Lake Havasu City, Arizona. The preferred transmitter site is located atop Oatman Mountain and is identified by the following geographical coordinates:

35° 01' 57" North Latitude  
114° 21' 56" West Longitude

FCC Rule Section 73.685(b) says in part:

"The location should be so chosen that line-of-sight can be obtained from the antenna over the principal community to be served; in no event should there be a major obstruction in this path."

In the original statement prepared for Meridian to amend the TV Table of Allotments, it was demonstrated that the preferred site for channel 34 has line-of-sight to the community of Laughlin. Such is not the case to the community of Lake Havasu City.

Included as Engineering Exhibit E-1 is a portion of the 7.5 minute topographical map depicting Lake Havasu City. Three locations are depicted on this exhibit. These three locations were selected to represent the far edge of the community boundaries from the preferred transmitter site along three different radials. Each location represents a point on either the 173, 176 or 178 degree radial. Each location is labeled accordingly.



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## **SUPPLEMENTAL ENGINEERING EXHIBIT CONTINUED**

The terrain elevations from the preferred transmitter site along each of the three radials to the community of Lake Havasu City were retrieved using a 3 arc second terrain database. The propagation path to each location is depicted in Engineering Exhibits E-2 through E-4.

As is readily evident, line of site coverage does not exist to any of these three locations. The obstructions are such that no location within the community of Lake Havasu City will have an unobstructed path from Meridian's preferred transmitter site.

It will be impossible to provide Lake Havasu City with line-of-site coverage from the preferred transmitter site due to several conditions.

First, the close proximity of the obstructions to the community of Lake Havasu City prevents practical line-of-sight coverage. The geometry of the propagation path would require the transmitting antenna to be raised substantially (approximately 830 meters or 2,700 feet) higher in order for line-of-sight propagation to be achieved.

Secondly, the Bureau of Land Management, (manager of the Oatman Mountain communications site), has restricted communications towers and antennas from exceeding 199 feet above ground level.

These two facts will prevent line-of-sight coverage to Lake Havasu City from Meridian's preferred transmitter site.



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MERIDIAN COMMUNICATIONS COMPANY  
IN SUPPORT OF A PETITION TO AMEND  
THE TV TABLE OF ALLOTMENTS  
LAUGHLIN, NEVADA**

**AFFIDAVIT**

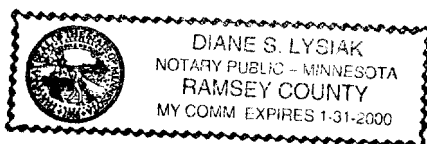
RAMSEY COUNTY                    )  
  )  
STATE OF MINNESOTA            )     ss:

Michael W. Radovich, being first duly sworn, says that he is an employee of Owl Engineering, Inc., consulting communications engineers with offices in Blaine, Minnesota: that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission: that the foregoing exhibit was prepared by him and under his direction; and that the Exhibits contained therein are true of his own personal knowledge except those stated to information and belief and, as to those Exhibits, verily believes them to be true and correct.



  
Michael W. Radovich, P.E.

Subscribed and sworn to before me this date October 28, 1996



  
Diane S. Lysiak  
Notary Public

My commission expires January 31, 2000

Topographic map of Lake Havasu City, Arizona, showing Point 176A. The map includes a scale bar (1:24,000), contour lines (40-foot interval), and various landmarks like Lake Havasu, Thompson Bay, and the Lake Havasu Golf & Country Club. Point 176A is marked with a black dot and labeled in a box. The map also shows roads, water tanks, and a boat ramp.



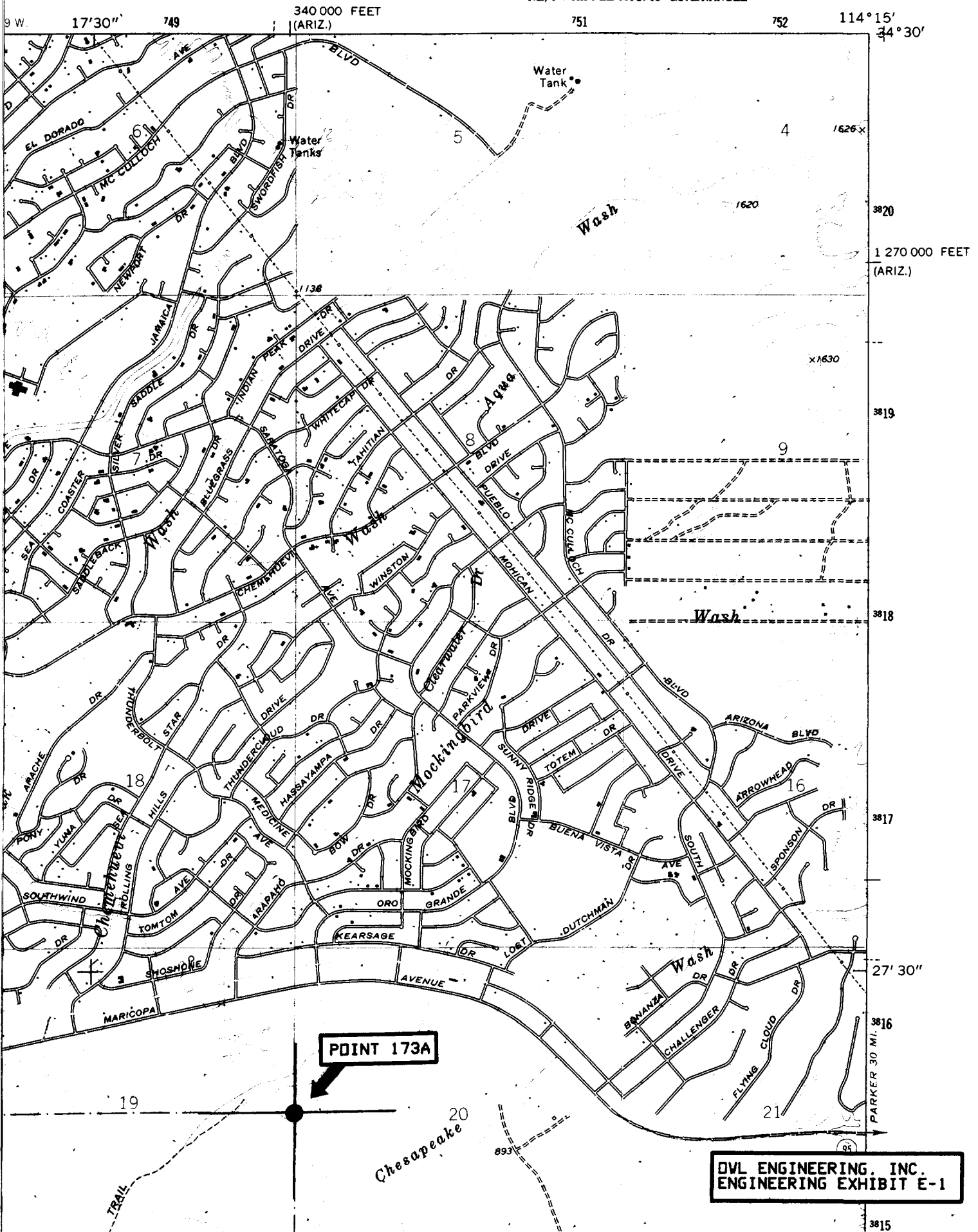
# LAKE HAVASU CITY SOUTH QUADRANGLE

ARIZONA-CALIFORNIA

7.5 MINUTE SERIES (TOPOGRAPHIC)

NE/4 WHIPPLE MTS. 15' QUADRANGLE

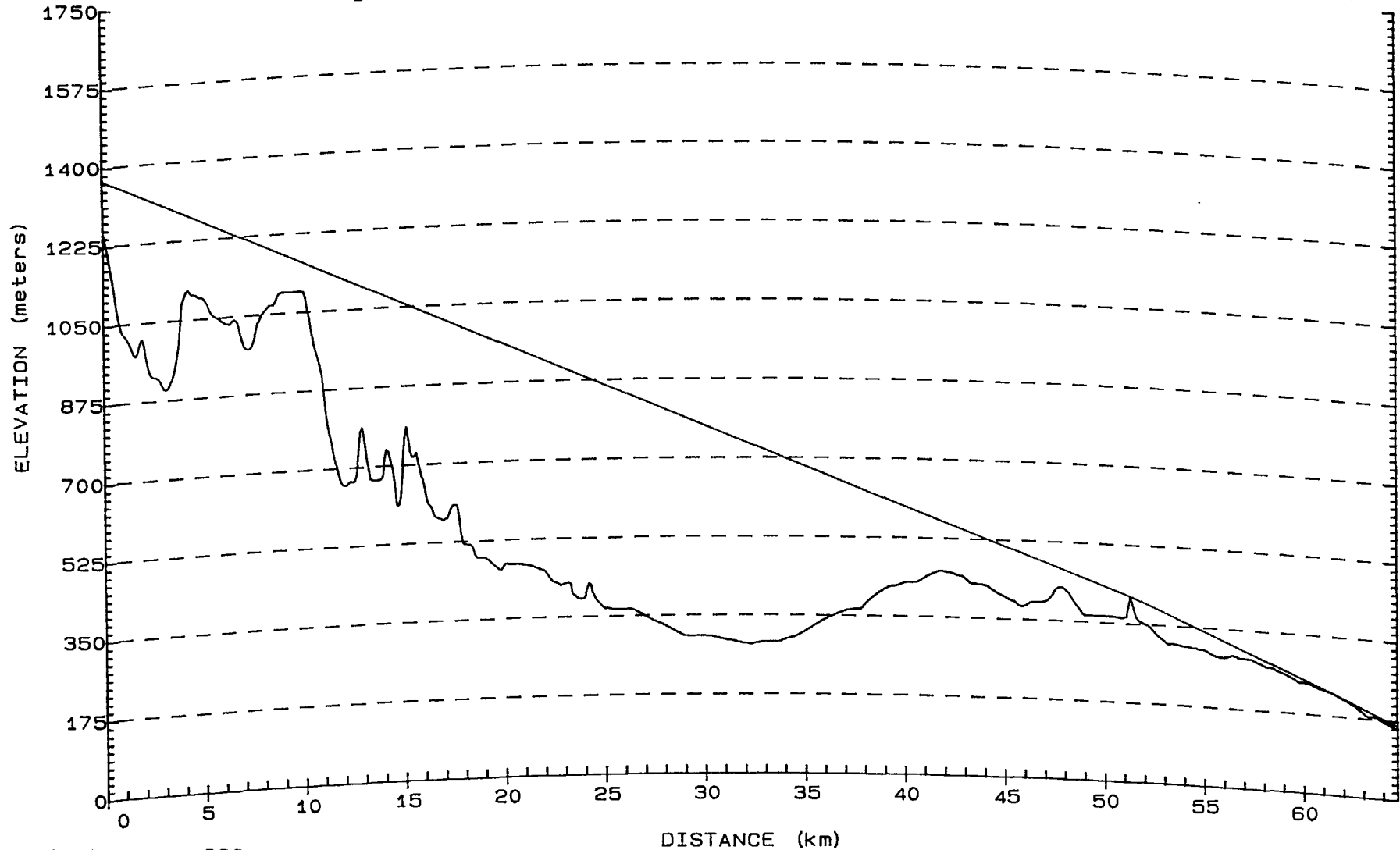
3153 II SW  
(CROSSMAN PEAK)



Site: Oatman Mountain  
N 35 1 57 W 114 21 56  
Ant. Elev. (AMSL): 1370.0 m  
Path azimuth: 176.01 degs.

Frequency: 593.0 MHz  
Path Length: 64.7 km  
Total Path Loss: 142.0 dB  
Excess Path Loss: 17.9 dB

Site: Point 176A  
N 34 27 7 W 114 18 59  
Ant. Elev. (AMSL): 165.0 m  
Path azimuth: 356.03 degs.



K factor: 1.333

3 Second Database - NAD 27

Rain loss: .0 dB

Urban loss: .0 dB

Foliage loss: .0 dB

Owl Engineering, Inc.  
8899 Hastings St. NE  
Minneapolis, MN 55449

Lake Havasu City, AZ

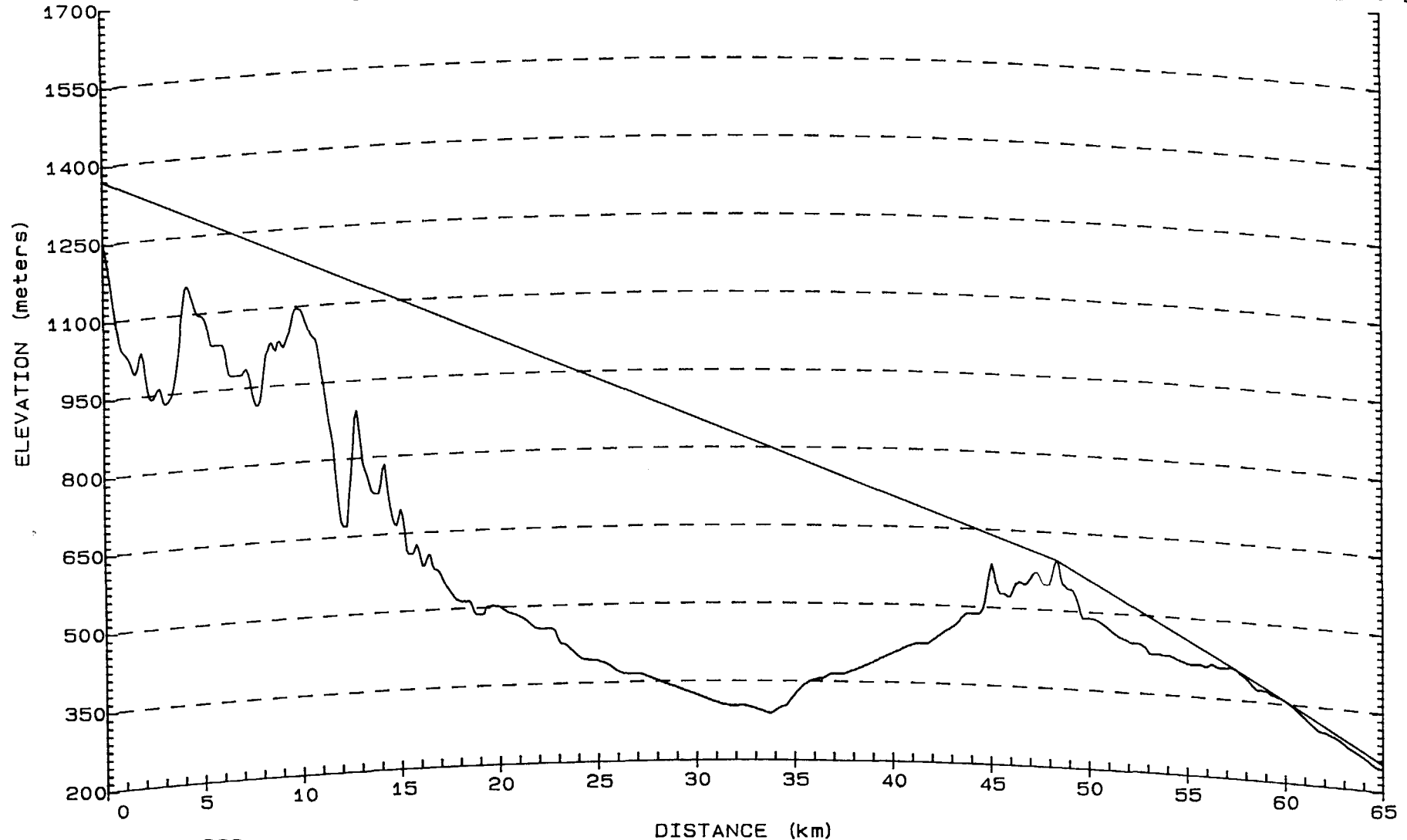
October 1996

Exhibit E-3

Site: Oatman Mountain  
N 35 1 57 W 114 21 56  
Ant. Elev. (AMSL): 1370.0 m  
Path azimuth: 173.12 degs.

Frequency: 593.0 MHz  
Path Length: 65.0 km  
Total Path Loss: 153.6 dB  
Excess Path Loss: 29.4 dB

Site: Point 173A  
N 34 27 7 W 114 16 50  
Ant. Elev. (AMSL): 253.0 m  
Path azimuth: 353.16 degs.



K factor: 1.333

3 Second Database - NAD 27

Rain loss: .0 dB

Urban loss: .0 dB

Foliage loss: .0 dB

Owl Engineering, Inc.  
8899 Hastings St. NE  
Minneapolis, MN 55449

Lake Havasu City, AZ

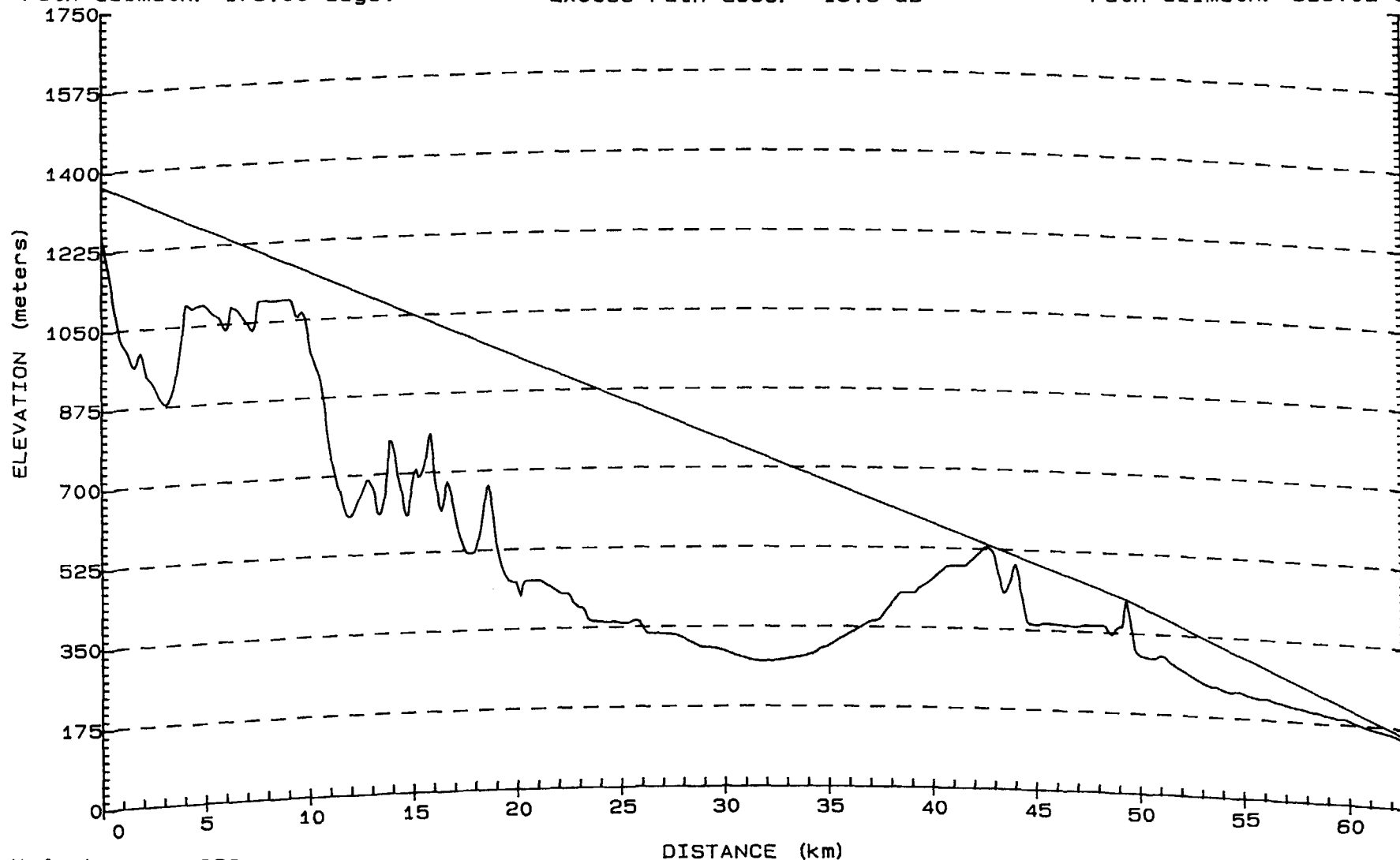
October 1996

Exhibit E-2

Site: Oatman Mountain  
N 35 1 57 W 114 21 56  
Ant. Elev. (AMSL): 1370.0 m  
Path azimuth: 178.00 degs.

Frequency: 593.0 MHz  
Path Length: 62.8 km  
Total Path Loss: 137.4 dB  
Excess Path Loss: 13.6 dB

Site: Point 178A  
N 34 28 5 W 114 20 30  
Ant. Elev. (AMSL): 154.0 m  
Path azimuth: 358.02 degs.



K factor: 1.333

3 Second Database - NAD 27

Rain loss: .0 dB

Urban loss: .0 dB

Foliage loss: .0 dB

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Lake Havasu City, AZ

October 1996

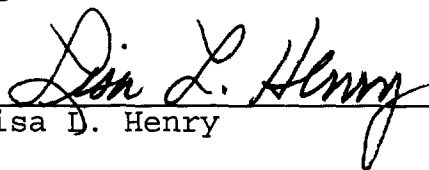
Exhibit E-4

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of November, 1996, I caused copies of the foregoing "Supplement to Petition for Rulemaking," to be hand delivered to the following:

John A. Karousos  
Chief, Allocations Branch  
Room 554  
Federal Communications Commission  
2000 M Street, N.W.  
Washington, D.C. 20554

Nancy Joyner  
Mass Media Bureau  
Room 557  
Federal Communications Commission  
2000 M Street, N.W.  
Washington, D.C. 20554

  
\_\_\_\_\_  
Lisa D. Henry